

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA)	
)	
Plaintiff,)	
)	No. 18 CR 789
v.)	
)	Hon. Gary Feinerman
DENY MITROVICH,)	
)	
Defendants.)	

DEFENDANT’S MOTION MODIFY CONDITIONS OF RELEASE

Now comes the defendant, Deny Mitrovich, by and through his undersigned attorney, and respectfully requests this Honorable Court to modify the conditions of release to replace his current third-party custodian. In support, the following is offered:

1. Mr. Mitrovich is released on a \$50,000 secured bond. As part of his conditions of release, he is currently on electronic monitoring with movement allowed for work, doctors’ appointments, and meetings with his attorney. Mr. Mitrovich is also under the supervision of a third-party custodian – his wife.

2. Since being on bond, Mr. Mitrovich has had no violations of the conditions of his release.

3. Mr. Mitrovich and his wife have been experiencing marital problems. The status and future of their relationship is, at best, uncertain.

4. As this Court is aware, Mr. Mitrovich’s father recently passed away. Because Mr. Mitrovich’s mother is now living alone, it is her intention to move in with Mr. Mitrovich at the residence where he currently resides.

1. Mr. Mitrovich respectfully request this Honorable Court to modify his conditions of release to allow his mother to be his new third-party custodian as opposed to his wife. In an effort to help protect his mother's privacy, the undersigned will provide her name, date of birth, and phone number to Assistant United States Attorney Andrew Erskine and Pretrial Services Officer Matthew Bonestroo so that they can look into whether or not they have any objection to her acting as Mr. Mitrovich's third-party custodian. Additionally, the undersigned as informed Mr. Mitrovich and the the proposed third-party custodian that she needs to be present during the presentment of the instant motion so that this Court is able to properly admonish her or conduct any sort of inquiry into her fitness to act in such capacity.

5. Notwithstanding this motion, Mr. Mitrovich will continue to reside in the same location and all other conditions of release will remain the same.

Wherefore, for the above-mentioned reasons, defendant Deny Mitrovich respectfully requests this Honorable Court to enter an order modifying the conditions of his release, allowing him to replace his third-party custodian.

Respectfully submitted,

/s/ Vadim A. Glozman
Attorney For Deny Mitrovich

LAW OFFICES OF VADIM A. GLOZMAN
53 W. Jackson Blvd., Suite 1410
Chicago, IL 60604
(312) 726-9015

CERTIFICATE OF SERVICE

I, Vadim A. Glozman, an attorney for Defendant Deny Mitrovich, hereby certify that on this, the 14th day of May, 2021, I filed the above-described document on the CM-ECF system of the United States District Court for the Northern District of Illinois, which constitutes service of the same.

Respectfully submitted,

/s/ Vadim A. Glozman

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